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PORTLAND, MAINE
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UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 08-
	)	
ELIZABETH YOUNG	)	

PROSECUTION VERSION

If this case were to proceed to trial, the United States Attorney would prove the following facts beyond a reasonable doubt:

Beginning on a date unknown, but no later than August 2007, and continuing until March 24, 2008, in the District of Maine and elsewhere, the defendant, Elizabeth Young, knowingly and intentionally conspired to distribute and possess with intent to distribute a mixture or substance containing cocaine base, also known as crack cocaine, and to distribute and possess with intent to distribute a mixture or substance containing cocaine.

On March 24, 2008, Drug Enforcement Administration ("DEA") task force agents received information that the defendant had recently returned from the Atlanta, Georgia area with an amount of cocaine base. At approximately 4:00 p.m., agents approached the defendant's apartment and identified themselves to the defendant. The defendant acknowledged that she had "stuff" in her apartment and knew what the agents were looking for. The defendant signed a consent to search form, giving agents permission to search the apartment.

Prior to the search commencing, the defendant voluntarily retrieved a makeup bag from her bedroom closet and handed it to an agent. This bag contained approximately $5,780 in United States currency as well as cocaine, cocaine base, and heroin.

The defendant told agents that she had already sold some of the drugs she received in

Georgia and that the majority of the money accompanying the drugs were direct proceeds of drug trafficking.

A forensic chemist would testify that the contents of the drugs recovered from the defendant on March 24, 2008, contained 43.6 net grams of cocaine hydrochloride, 17.8 net grams of cocaine base and 8.5 net grams of heroin.

Dated at Portland, Maine this 7th day of August 2008.

Paula D. Silsby
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2008, I have filed the foregoing Prosecution Version this date by using the ECF system, which will cause a copy to be sent to:

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